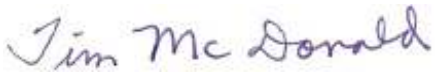
TDEC Small MS4 Annual Report
July 1, 2008– June 30, 2009
Report due September 30, 2009

Permittee Tracking No. TNS075566

Permittee Name: Hamilton County Phase II MS4s

This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in part 6.7 of the small MS4 general permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Signed

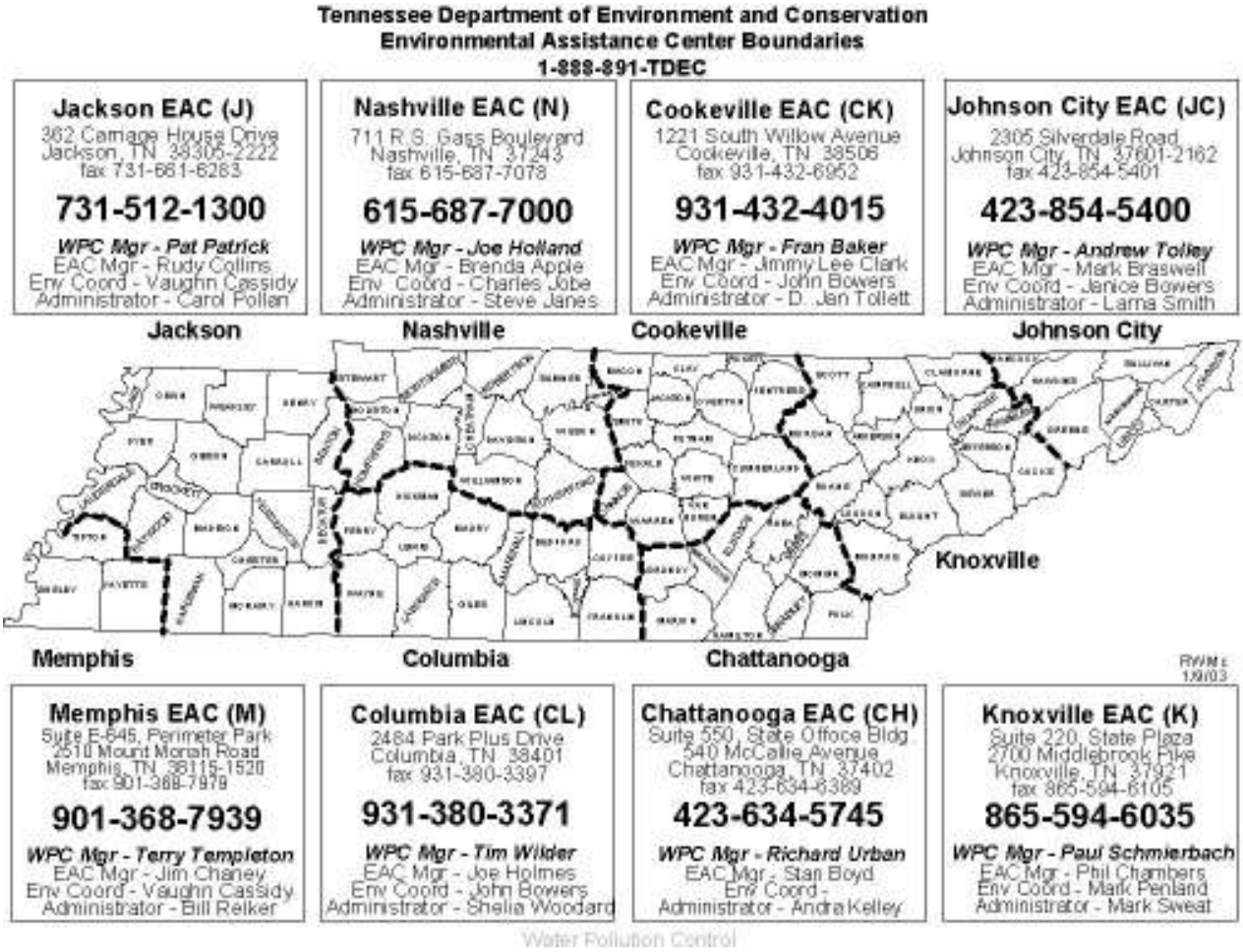
9/30/2009
Dated

Timothy McDonald, Program Manager, Hamilton County Water Quality Program
Printed Name and Title

Send the annual report to the two addresses shown on the next page.

Submit your annual report to the Environmental Assistance Center for your county as shown in the map below *and* to the following address:

Chris Moran
Tennessee Division of Water Pollution Control
L&C Annex, 6th Floor
401 Church Street
Nashville, TN 37243-1534



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I. Status of Compliance with Permit Conditions (5.4.1) Six Minimum Measures, BMPs and Milestones

A. Status of Compliance with BMP Milestones

The following table is designed for you to report the status of your progress in implementing storm water management BMPs. The table includes a list of BMPs by the code number. These BMP codes refer to the BMPs, and the respective codes, that you submitted to us in your NOI. [Or, in annual reports for years 2-5, these codes refer to amended BMPs as you reported to us in the previous year's annual report]. Add rows if you have more than four BMPs; e.g., 1A, 1B, 1C, 1D, 1E, 1F.

Likewise, the milestone refers to the Year 3 milestone that you included in your NOI. [Or, in subsequent annual reports, the milestone refers to the milestone that you reported to us in the previous year's annual report.]

You must check Yes or No for each of the BMPs that you submitted in your NOI. (N/A has been placed in the Yes column for each BMP that did not have a Year 3 milestone.)

- Check **Yes** if the BMP is essentially unchanged and you accomplished the milestone. Indicate a date of completion.
- Check **No** if you did not accomplish the milestone. If you check No, and you are not changing or replacing the BMP or the milestones, indicate the date you expect to complete the milestone.
- Check in one of the **Amended** columns if you wish us to recognize an amended BMP or an amended milestone. If you are amending the BMP, most likely you will also need to amend the milestone, and in that case, check both Amended BMP and Amended Milestone. If the BMP is unchanged, but you are changing milestones in subsequent years, check in the Amended Milestones column.
- If you indicate an amended BMP or milestone, then you should check in last column as well, indicating that you describe the amendment below and provide the necessary analysis in Part VIII.

BMP Code	Milestone	Yes	No	Date completed or If "No," Date to be completed	Amended/Replaced		An "Amended" response is described below and in Part VIII.
					BMP	Milestones	Yes/No
1A	Year 6	√		8/4/2008			
1B	Year 6	√		09/27/2008			
1C	Year 6	√		2008-2009			
1D	Year 6	√		2008-2009			
1E	Year 6	√		10/1/08 and 6/2/09			
1F	Year 6	√		Year Round			
1G	Year 6	√		Year Round			
1H	Year 6	√		Year Round			

BMP Code	Milestone	Yes	No	Date completed or If "No," Date to be completed	Amended/Replaced		An "Amended" response is described below and in Part VIII
					BMP	Milestones	Yes/No
1I	Year 6	√		Year Round			
2A	Year 6	√		Year Round			
2B	Year 6	√		Year Round			
2C	Year 6	√		Year Round			
2D	Year 6	√		10/4/2008			
3A	Year 6	√		Year Round			
3B	Year 6	√		Year Round			
3C	Year 6	√		Year Round			
3F	Year 6	√		5/16/2008			Updated 5/16/08
4A	Year 6	√		1/1/08			
4B	Year 6	√		Year Round			
4E	Year 6	√		12/5/2007			
4F	Year 6	√		12/5/2007			
4G	Year 6	√		1/1/2008			
5A	Year 6	√		1/1/2008			
5B	Year 6	√		Year Round			
5C	Year 6	√		1/1/2008			
5D	Year 6	√		1/1/2008			
5E	Year 6	√		1/1/2008			
5F	Year 6	√		1/1/2008			
5I	Year 6	√		1/1/2008			
6A	Year 6	√		2/27/2008			
6B	Year 6	√		Year Round			
6C	Year 6	√		03/27/09			Updated training on 3/27/09

B. Status of compliance for *amended and replaced BMPs*

For every amended/replaced BMP and/or milestone above, provide the compliance status with respect to the new milestone for this year. The new milestones must be detailed in Appendix A.

BMP Code	Mile-stone	Milestone Description	Yes	No	Date completed or If "No," Date to be completed

Explanation for "No" Responses in either table above

BMP Code	Explanation for "No" Response

II. Assessment of the appropriateness of identified BMPs (5.4.1)

For every BMP or amended BMP, assess the appropriateness of the BMP in the following table. For the second year annual report, assume "Good" unless you have evidence to support an inappropriate, minimal or superior assessment.

BMP Code	Short title	We consider the listed BMP appropriate to the following degree:				
		Inappropriate	Minimal	Good	Superior	
1A	School curriculum			√		
1B	Illicit Discharge Education			√		
1C	Public Education on Construction Site Requirements			√		
1D	Household Hazardous Wastes, Pet Wastes, Fertilizers, Pesticides, and Illegal Dumping			√		
1E	Contractor Education for Erosion Control			√		
1F	Professional Education for Post-Construction Program			√		

BMP Code	Short title	We consider the listed BMP appropriate to the following degree:				
		Inappropriate	Minimal	Good	Superior	
1G	Outreach			√		
1H	MS4 Support Group			√		
1I	Employee Training			√		
2A	Hotline			√		
2B	Construction/post construction enforcement			√		
2C	Illicit discharge detection & elimination			√		
2D	Public participation opportunities			√		
3A	System map and inventory			√		
3B	Illicit discharge detection and elimination program			√		
3C	Ordinance			√		
3F	Priority detection sites			√		
4A	BMP Manual on erosion control			√		
4B	Ordinance			√		
4E	Site inspection and enforcement procedures			√		
4F	Plans review			√		
4G	Permitting			√		
5A	BMP Manual for post construction runoff controls			√		
5B	Ordinance			√		
5C	Total suspended solids (TSS) removal			√		
5D	Peak flow controls			√		
5E	Maintenance and inspection agreement with deed			√		
5F	Buffer zone requirement			√		
5I	Plans review			√		
6A	Stormwater pollution prevention plans (SP3) for municipal facilities			√		
6B	SRP for facilities			√		
6C	In-house training program			√		

III. Progress with respect to MEP and Measurable Goals (5.4.1)

Element 5.4.1 requires you to report progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP)[1], and the measurable goals for each of the minimum control measures.

A. MEP

Of the 32 BMPs that comprise our storm water management program in the six minimum measures, we have accomplished Year 6 milestones for 32 of 32. This does represent substantial progress in achieving the statutory goal of reducing the discharge of pollutants to the MEP.

B. Measurable goals

Of the 32 BMPs shown above, we have accomplished Year 6milestones for 32 of 32. This represents progress toward achieving the measurable goals identified in our original NOI and in this annual report. For the measurable parameters/goals we have been able to track for this past year, the measurements are recorded in Part IV.

Jim Mc Donald

Signed

9/30/09

Dated

Timothy McDonald, Program Manager, Hamilton County Water Quality Program

Printed Name and Title

Go to next page.

IV. Results of Information Collected and Analyzed (5.4.2)

Element 5.4.2 of the permit requires you to report results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP

A brief summary of information, including analytical and/or non-analytical monitoring results, is listed below. Detailed information is collected and available at the offices of the MS4.

Parameter	Relevant BMP, or Purpose of Information	Conclusions

Go to next page.

V. Planned Activities and Proposed Changes to the Storm Water Management Program (5.4.3 and 5.4.4)

A. Storm water activities planned for next reporting cycle

Element 5.4.3 requires a summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule).

The storm water activities planned for the next reporting cycle are the BMPs as reflected in our NOI and as amended (if any) in subsequent annual reports, including this annual report, and are as follows:

BMP Code	Title/Name of BMP	Milestone for next reporting cycle
1A	School curriculum	**Continue Project WET Training. Continue purchase & placement of "Journey of the Blob" and "After the Rain" DVD in school libraries.**
1B	Illicit Discharge Education	**Continue with Education & Outreach from Year 5. Maintain website, County Fair Booth subscription to Waterworks!**
1C	Public Education on Construction Site Requirements	**Continue Public Education using Waterworks!**
1D	Household Hazardous Wastes, Pet Wastes, Fertilizers, Pesticides, and Illegal Dumping	**Continue with Public Education using Waterworks! Distribute information at the County Fair.**
1E	Contractor Education for Erosion Control	**Continue to Support Level I EPSC Course in Chattanooga**
1F	Professional Education for Post-Construction Program	**Continue to Support Level II EPSC Certification Classes through information and course schedule distribution**
1G	Outreach	**Continue to update of website and printed media. Program staff to attend public forums to provide information, receive feedback and distribute printed media.**
1H	MS4 Support Group	**Continue to Coordinate and Support SE TN MS4 Meetings**
1I	Employee Training	**Continue further Employee Training in Support of Program Goals**
2A	Hotline	**Continue to Operate Hotline using designated SOP.**
2B	Construction/post construction enforcement	**Continue to distribute printed media and train the public in the use of the hotline related to enforcement of construction and post-construction controls.**
2C	Illicit discharge detection & elimination	**Continue answering hotline and performance of follow-up activities to eliminate illicit discharges; document calls and follow-up activities.**
2D	Public participation opportunities	**Continue to provide information on Public Participation Opportunities, as well as supporting River Rescue, etc.**

3A	System map and inventory	**Continue Mapping**
3B	Illicit discharge detection and elimination program	**Continue IDDE program as developed in Year 5. Use CWP's IDDE Guidance Manual**
3C	Ordinance	**Continue Enforcement**
3F	Priority detection sites	**Follow up with Non-Stormwater Discharge Inspections**
4A	BMP Manual on erosion control	**Continue refer others to BMP Manual website**
4B	Ordinance	**Continue Enforcement**
4E	Site inspection and enforcement procedures	**Continue with Inspection & Enforcement Procedures in place**
4F	Plans review	**Continue with Plans Review procedures in place**
4G	Permitting	**Continue to develop additional tracking components of Permitting Software.**
5A	BMP Manual for post construction runoff controls	**Continue refer others to BMP Manual website**
5B	Ordinance	**Continue enforcement**
5C	Total suspended solids (TSS) removal	**Continue to require engineering support to be submitted with plans showing BMPs associated with TSS removal as included with BMP Manual**
5D	Peak discharge controls	**Continue to require design details to be submitted with plans showing BMPs associated with peak flow control as included in BMP Manual**
5E	Maintenance and inspection agreement with deed	**Continue the enforcement of the use of the maintenance and inspection agreements by applicable property owners.**
5F	Buffer zone requirement	**Continue to require design details to be submitted with plans showing BMPs associated with riparian buffers**
5I	Plans review	**Continue with Plans Review procedures in place**
6A	Stormwater pollution prevention plans (SP3) for municipal facilities	**Continue with plan from Year 4 & 5 & 6**
6B	SRP for facilities	**Continue with plan from Year 4 & 5 & 6**
6C	In-house training program	**Continue with plan from Year 4 & 5 & 6**

A. Additional, significant activities planned for the next reporting cycle are noted below.

Activity	Summary Description	Purpose

B. Proposed changes to storm water management program

Element 5.4.4 requires a report on proposed changes to your storm water management program, including changes to any BMPs or any identified measurable goals that apply to the program elements.

Amended and replacement BMPs (if any) are reflected in Part I.A. and appendix A, and in the above table and will not be repeated here. Additional, proposed changes are noted below.

Change to Program	Summary Description	Rationale

VI. Water Quality Controls for Discharges to Impaired Waterbodies (3.1.2)

The table below lists impaired waterbodies affected by discharges from this MS4, the pollutants of concern, and the two BMPs we believe to be the most significant in controlling discharges of these pollutants.

Stream Name	Pollutants	Priority BMP 1	Priority BMP 2
Spring Creek	*Escherichia coli*	Illicit discharge detection and elimination program – attempt to identify sewer collection system failures	Promote public active involvement through education and reporting through hotline
S. Chickamauga Creek	*Phosphorous; Physical substrate habitat alterations; Escherichia coli; Loss of biological integrity due to siltation*	Erosion control plans review; Post construction runoff requirements, permitting, and enforcement for developments	Promote public active involvement through education and reporting through hotline
Ninemile Branch	*Low DO; Physical substrate habitat alterations*	Promote public use of good storm water practices through education, including effects on storm water from grazing practices	Buffer zone enforcement to reduce continued alterations to stream side or littoral vegetative cover

Rogers Branch	*Pesticides; low DO; Physical substrate habitat alterations*	Public education regarding use of hazardous substances	Post construction development and erosion control plans review, permitting, and enforcement for developments
N. Chickamauga Creek	*pH; Physical substrate habitat alterations*	Erosion control plans review; Post construction runoff requirements, permitting, and enforcement for developments	Buffer zone enforcement to reduce continued alterations to stream side or littoral vegetative cover
Unnamed Tributary to Chickamauga Reservoir(near Dallas Rd)	*Biological integrity loss due to undetermined cause*	To be determined when cause has been found	
Nickajack Reservoir	*PCBs; Dioxins (The reasons for impairment of the Nickajack Reservoir is from previous activities)*		
Stringers Branch	*Escherichia coli; Habitat loss due to alteration in stream-side or littoral vegetative cover*	Illicit discharge detection and elimination program; Permit program buffer requirements	Promote active public involvement through education and reporting with the use of hotline
Friars Branch	*Loss of Biological integrity due to siltation Nutrients Habitat loss due to alteration in stream-side or littoral vegetative cover Escherichia coli*	Illicit discharge detection and elimination program; Permit program buffer requirements	Promote active public involvement through education and reporting with the use of hotline
Ninemile Branch	*Low Dissolved Oxygen Physical Substrate Habitat Alteration*	Erosion control plans review; Post construction runoff requirements, permitting, and enforcement for developments	Buffer zone enforcement to reduce continued alterations to stream side or littoral vegetative cover
Wolftever Creek	*Escherichia coli*	Illicit discharge detection and elimination program;	Promote public active involvement through education and reporting through hotline
Wilkerson Branch	*Escherichia coli*	Illicit discharge detection and elimination program;	Promote public active involvement through education and reporting through hotline

The table below lists impaired waterbodies for which the state has promulgated a TMDL. For the waterbodies indicated, we have complied with the requirements of the permit as noted by the check marks. [The table below includes two columns for two TMDLs. If additional space is needed, add additional table(s).]

	Waterbody Name/ Pollutant of Concern	**Waterbody Name/ Pollutant of Concern**
Permit Requirement	**North Chickamauga Creek/** *Siltation/Hab.Alteration*	**Stringers Branch** *eColi*
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	Yes	Yes
3.1.3.2 Does the TMDL include a pollutant waste load allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	Yes	Yes
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	Yes	Yes
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	Yes	Yes
3.1.3.4 Or are additional control measures are necessary?	No	No
3.1.3.5 Current and planned control measures are documented.	Yes	Yes
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	Meeting our Measurable goals constitutes adequate controls	Meeting our Measurable goals constitutes adequate controls
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	N/A	N/A

	Waterbody Name/ Pollutant of Concern	Waterbody Name/ Pollutant of Concern
Permit Requirement	**Stringers Branch** *Siltation/Hab. Alteration*	**South Chickamauga Creek** *Siltation/Hab. Alteration*
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	Yes	Yes
3.1.3.2 Does the TMDL include a pollutant waste load allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	Yes	Yes
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	Yes	Yes
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	Yes	Yes
3.1.3.4 Or are additional control measures are necessary?	No	No
3.1.3.5 Current and planned control measures are documented.	Yes	Yes
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	Meeting our Measurable goals constitutes adequate controls	Meeting our Measurable goals constitutes adequate controls
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	N/A	N/A

	Waterbody Name/ Pollutant of Concern	Waterbody Name/ Pollutant of Concern
Permit Requirement	**Ninemile Branch** *Siltation/Hab. Alteration*	**South Chickamauga Creek** *e.Coli*
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	Yes	Yes
3.1.3.2 Does the TMDL include a pollutant waste load allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	Yes	Yes
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	Yes	Yes
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	Yes	Yes
3.1.3.4 Or are additional control measures are necessary?	No	No
3.1.3.5 Current and planned control measures are documented.	Yes	Yes
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	Meeting our Measurable goals constitutes adequate controls	Meeting our Measurable goals constitutes adequate controls
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	N/A	N/A

	Waterbody Name/ Pollutant of Concern	Waterbody Name/ Pollutant of Concern
Permit Requirement	**Spring Creek** *e.Coli*	
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	Yes	
3.1.3.2 Does the TMDL include a pollutant waste load allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	Yes	
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	Yes	
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	Yes	
3.1.3.4 Or are additional control measures are necessary?	No	
3.1.3.5 Current and planned control measures are documented.	Yes	
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	Meeting our Measurable goals constitutes adequate controls	
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	N/A	

VII. Protection of Listed Threatened or Endangered Species (3.2)

We have followed the procedures given in section 3.2 of the Tennessee small MS4 general permit to ascertain whether or not storm water discharges from the MS4 are likely to jeopardize the continued existence of any species that are listed as endangered or threatened under the ESA, or result in the adverse modification or destruction of habitat that is designated as critical under the ESA ("critical habitat"). Below is a table indicating the procedures we have followed. We retain documentation of the evaluations and decisions reached through the evaluation.

[See the permit at section 3.2 for more detailed list of evaluation criteria.]

Evaluation criteria	Yes/No	Notes
3.2.1.2.1 Criteria A: No endangered or threatened species or critical habitat in proximity to MS4 or the point where discharges reach the receiving water	No	
3.2.1.2.2 Criteria B: Formal or informal consultation with the Fish and Wildlife Service under Section 7 of the Endangered Species Act (ESA) has been concluded and that consultation addressed effects of storm water activities or resulted in a no jeopardy or not-likely-to-affect opinion.	No	
3.2.1.2.3 Criteria C: Activities are authorized under Section 10 of the ESA	No	
3.2.1.2.4 Criteria D: Evaluated the effects of storm water discharges; we do not have reason to believe the discharge and discharge-related activities will jeopardize species or cause adverse modification or destruction of critical habitat.	Yes	T&E species related to waterbodies in the MS4 were evaluated and no critical habitats are designated for these species within the MS4 watersheds.
3.2.1.2.5 Criteria E: Our storm water discharges and related activities are already addressed in another operator's certification of eligibility. We agree to comply with conditions of that eligibility.	No	

_____ _____

Signed Dated

Timothy McDonald, Program Manager, Hamilton County Water Quality Program

Printed Name and Title

VIII. Explanation of Amended or Replaced BMPs (from Part I)

The following table provides description(s) of BMPs and/or milestones we wish to amend this reporting year and subsequent years, as indicated. [Add tables as necessary.]

For every BMP that is being amended or replaced, provide the following information and analysis. The BMPs you describe here should match the ones you indicated as "Amended/Replaced" in Part I.A. of this annual report.

BMP Code: 3F Modified Milestones: Year 6	
New BMP short title:	Priority Detection Sites
New BMP description:	Same as year 5
BMP is being amended/replaced as:	Ineffective Infeasible ✓See narrative
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 6	Follow-up with non-stormwater discharge inspections
Narrative:	Updated list of priority sites on 5/16/2008.

BMP Code: 6C Modified Milestones:	
New BMP short title:	In-House Training Program
New BMP description:	Same as year 5
BMP is being amended/replaced as:	Ineffective Infeasible ✓See narrative
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 6	Continue with plan from year 4 & 5
Narrative:	Updated Training on 3/27/2009

IX. Tracking of measurable goals

For each of your BMPs, you should have established a measurable parameter, and goal in terms of that measurable parameter. Measurable parameters are ways to measure activities or effects of a BMP. The goal is the parameter value established as a target. If you are not yet measuring the parameter for a given BMP, indicate Not Applicable Yet (NAY) in the Result column.

BMP Code	BMP Title	Measurable parameter	Result	Goal
1A	**School curriculum**	Number of teachers taught	34	40
1B	**Illicit discharge enforcement opportunities**	Number of public service announcements played	Waterworks!	
1C	**Construction/post construction site requirements**	Number of contacts through Level I classes, Homebuilders, AIA, etc.	100	150
1D	**Household hazardous wastes, pet wastes, fertilizer, pesticides, and illegal dumping**	Number of people educated through website, County Fair Booth, Etc.	9126	300
1E	**Contractor education for erosion control**	Number of contractors and owners educated (Level I)	100	TBD
1F	**Professional education for post construction program**	Number of professionals educated (Level II)	50	TBD
1G	**Outreach**	Number of citizens educated during outreach events	50000	TBD
1H	**MS4 Support Group**	Number of meetings coordinated	4	4
1I	**Employee Training**	Number of employee training events attended.	20	TBD
2A	**Hotline**	Number of calls responded to	291	291
2B	**Construction/post construction enforcement**	Number of violations reported by public	62	TBD
2C	**Illicit discharge detection**	Number of illicit discharges reported by public	54	54
2D	**Public Participation Opportunities**	Number of surveys distributed and received	Waterworks!	
3A	**System map and inventory**	Stream Miles Mapped	72	72
3B	**Illicit discharge detection and elimination program**	Number of eliminated discharges	35	TBD
3C	**Ordinance**	Adopt ordinance in 8 participating communities	8	8

BMP Code	BMP Title	Measurable parameter	Result	Goal
3F	**Priority detection sites**	Number of industries targeted for detection procedures	17	TBD
4A	**BMP Manual on erosion control**	Manual has been created and/or adopted by program	1	1
4B	**Ordinance for construction sites**	Ordinances have been passed and implemented in all eight communities	8	8
4E	**Site inspection and enforcement procedures**	Number of sites inspected; number of citations issued	235/68	TBD
4F	**Plans review**	No. of permits issued	17	TBD
4G	**Permitting**	No. of Sites Permitted	17	TBD
5A	**BMP Manual for post construction runoff controls**	Manual has been created and/or adopted by the Program	1	1
5B	**Ordinance**	Adopt ordinance in 8 participating communities	8	8
5C	**Total suspended solids (TSS) removal**	No. of sites with TSS removal controls	6	TBD
5D	**Peak discharge controls**	No. of sites with peak discharge control	6	TBD
5E	**Maintenance and inspection agreement with deed**	No. of sites with maintenance and inspection agreements included on deed	6	TBD
5F	**Buffer zone requirement**	No. of sites designed with buffer zones	3	TBD
5I	**Plans review**	No. of permits issued	6	TBD
6A	**Storm water pollution prevention plans (SWPPP) for municipal facilities**	No. of municipal facilities with a SWPPP developed and implemented	151	151
6B	**SRP for facilities**	No. of facilities with a SRP developed and implements	151	151
6C	**In-house training program**	No. of employees trained for the SWPPP and SRP	215	100

Footnotes

[1] *Maximum extent practicable* (MEP) is the statutory standard that establishes the level of pollutant reductions that operators of regulated MS4s must achieve. The CWA requires that NPDES permits for discharges from MS4s ''shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods.'' CWA 402(p)(3)(B)(iii).